

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA,

v.

ALL CRYPTOCURRENCY, VIRTUAL CURRENCY, FUNDS, MONIES, AND OTHER THINGS OF VALUE SEIZED, PURSUANT TO A SEIZURE WARRANT, FROM BINANCE AND ASSOCIATED WITH USER ID # 17392912, SUCH USER ID ASSOCIATED WITH THE NAME, VIPIN KUMAR, AND TETHER DEPOSIT ADDRESS, TCJvnhLCvCwqEzcYiZKbr9F4pkkiLPGzyv; and

ALL CRYPTOCURRENCY, VIRTUAL CURRENCY, FUNDS, MONIES, AND OTHER THINGS OF VALUE SEIZED, PURSUANT TO A SEIZURE WARRANT, FROM BINANCE AND ASSOCIATED WITH USER ID # 159588534, SUCH USER ID ASSOCIATED WITH THE NAME, RAHUL AGARWAL AND TRON (TRX) DEPOSIT ADDRESS TEp28dMpzcMo4X1rWb36gJ9HbWd1mqEtXS.

Civil Case No. 3:23-CV-395

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Civil Rule 83.1(f), Bryan G. Scott hereby respectfully seeks leave of Court to withdraw as counsel in this action for Claimant Vipin Kumar ("Claimant"). In support of this Motion, the movant states as follows:

1. On December 8, 2023, the undersigned filed a Notice of Appearance on behalf of Claimant, appearing as local counsel [Doc. No. 4]. That same day, the undersigned filed a Motion for Leave to Appear *Pro Hac Vice* as to Bradley L. Henry to appear on behalf of Claimant [Doc. No. 5]. On December 11, 2024, an Order granting the Motion for Leave to Appear *Pro Hac Vice* was entered [Doc. No. 7].

2. On or about February 21, 2024, Bradley L. Henry left the firm of Akerman LLP and joined the law firm of Blank Rome LLP.

3. Caroline Powell Donelan of Blank Rome LLP is a member of the North Carolina State Bar and of the bar of this Court and filed a Notice of Appearance on March 20, 2024 to act as new local counsel with Mr. Henry on behalf of Claimant [Doc. No. 13].

4. The last known mailing address for the Claimant is Level 41, Emirates Tower, Sheikh Zayed Road, Dubai, UAE, PO Box 31303.

5. This case is in its earliest stages. On September 24, 2024, the Court denied Claimant's motion to dismiss and ordered Plaintiff to file an amended complaint [Doc. No. 15]. On October 15, 2024, the Plaintiff filed its amended complaint [Doc. No. 16].

6. Allowance of this motion to withdraw will not prejudice any party or delay the proceedings in this action. Claimant has indicated his desire for Mr. Henry and Blank Rome LLP to continue as counsel of record in this matter, and has consented to withdrawal by Mr. Scott and Akerman LLP and substitution of Ms. Donelan and Blank Rome LLP. Indeed, new local counsel has already entered an appearance in this matter.

7. Claimant will continue to be represented by Bradley Henry as lead counsel and Caroline Powell Donelan, as new local counsel, so that there will be no gap in representation.

WHEREFORE, Bryan G. Scott respectfully requests that this Court issue an Order allowing him and the law firm of Akerman LLP to withdraw from this matter as counsel of record for Claimant.

This 29th day of October, 2024.

AKERMAN LLP

/s/ Bryan G. Scott

Bryan G. Scott, N.C. Bar No. 32920

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Local Counsel for Claimant Vipin Kumar

CERTIFICATE OF SERVICE

I hereby certify that on October 29th, 2024, I caused a copy of the foregoing Motion to Withdraw as Counsel to be filed electronically with the Court using the Court's CM/ECF system, which will transmit a notice of electronic filing to all counsel of record in this action.

AKERMAN LLP

/s/ Bryan G. Scott

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Local Counsel for Claimant Vipin Kumar